

A-16-738555-C

## DISTRICT COURT CIVIL COVER SHEET

County, Nevada

Case No.

XXVII

(Assigned by Clerk's Office)

**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):  FELICITAS ZAMBRANO	Defendant(s) (name/address/phone):  CARDENAS MARKETS, INC. d/b/a CARDENAS; DOES I-X, inclusive, and ROE CORPORATIONS I-X, inclusive,
Attorney (name/address/phone):  De Castroverde Law Group 1149 South Maryland Parkway Las Vegas, Nevada 89104 702.383.0606	Attorney (name/address/phone):

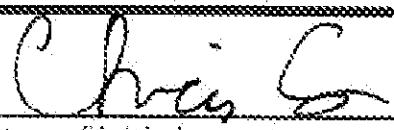
**II. Nature of Controversy** (please select the one most applicable filing type below)**Civil Case Filing Types**

<b>Real Property</b> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<b>Negligence</b> <input type="checkbox"/> Auto <input checked="" type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <b>Malpractice</b> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<b>Torts</b> <b>Other Torts</b> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
<b>Probate</b> <b>Probate</b> (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <b>Estate Value</b> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<b>Construction Defect &amp; Contract</b> <b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <b>Contract Case</b> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	<b>Judicial Review/Appeal</b> <b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
<b>Civil Writ</b> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant	<input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	<b>Other Civil Filing</b> <b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

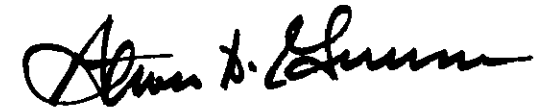
June 16, 2016

Date

  
 Signature of initiating party or representative

See other side for family-related case filings.

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06/16/2016 09:47:36 AM



CLERK OF THE COURT

**COMP**

Alex J. De Castroverde  
Nevada Bar No. 6950  
Orlando De Castroverde  
Nevada Bar No. 7320  
**DE CASTROVERDE LAW GROUP**  
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Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

FELICITAS ZAMBRANO,  
Plaintiff,

v.

CARDENAS MARKETS, INC. d/b/a  
CARDENAS; DOES I-V and ROES  
CORPORATIONS VI-X, inclusive.  
Defendants.

CASE NO.: A-16-738555-C  
DEPT NO.: XXVII

**COMPLAINT**

Plaintiff FELICITAS ZAMBRANO, by and through her attorneys, Orlando De Castroverde and Alex De Castroverde, complains against the Defendant as follows:

**I.**

All the events alleged in this Complaint took place in Clark County, Nevada.

**II.**

Plaintiff FELICITAS ZAMBRANO (herein referred to as "Plaintiff") is, and at all times mentioned in this Complaint was, a resident of Clark County, Nevada.

**III.**

Defendant CARDENAS MARKETS. (hereafter referred to as "Defendant") is, and at all times mentioned in this Complaint was, a foreign Corporation doing business in Clark County, Nevada.

///

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2 IV.

3 The true names and capacities of the Defendants DOE I through V and the  
 4 Defendants ROE CORPORATIONS VI through X are unknown to Plaintiff at this time.  
 5 Therefore, Plaintiff sues these Defendants by such fictitious names and when their true  
 6 names and capacities are ascertained, Plaintiff will amend this Complaint accordingly.  
 7 Plaintiff believes each of these Defendants designated as a DOE or ROE is responsible  
 8 in some manner for the injuries and damages suffered by Plaintiff.

9 V.

10 On or about July 17, 2015 Plaintiff was at Cardenas Supermarket in Las Vegas,  
 11 Nevada. Plaintiff was in the area under the control of the Defendant while grocery  
 12 shopping. As she moved through Defendant's area, Plaintiff stepped on a liquid  
 13 substance, slipped, and fell to the ground. There were no signs, or other objects,  
 14 warning of the unsafe and dangerous condition. As a result of the fall, Plaintiff suffered  
 15 bodily injury, pain and suffering.

16 VI.

17 **First Cause of Action - Negligence**

18 Defendant owed Plaintiff a duty to maintain its premises in a reasonably safe  
 19 condition and to warn of dangerous conditions. By creating and/or permitting a  
 20 dangerous condition to exist on its premises and failing to warn of such condition,  
 21 Defendant breached that duty. As a proximate result of that breach, Plaintiff has  
 22 suffered damages, which include but are not limited to bodily injury, past and future  
 23 medical specials, past and future pain and suffering, and mental anguish.

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VII.

Plaintiff has been required to retain the services of an attorney to prosecute this action.

**WHEREFORE**, Plaintiff, expressly reserving the right to amend this Complaint, prays for judgment against Defendant as follows:

1. General damages in excess of \$10,000;
2. Special damages in excess of \$10,000;
3. Attorney's fees and costs;
4. Interest at the statutory rate; and
5. For such other and further relief as the Court deems just and proper.

DATED this 7 day of June, 2016.

**DE CASTROVERDE LAW GROUP**

By:   
Orlando De Castroverde  
Nevada Bar No. 7320  
Alex De Castroverde  
Nevada Bar No. 6950  
Kimberly Valentin  
Nevada Bar No. 12509  
1149 S. Maryland Parkway  
Las Vegas, Nevada 89104  
Attorneys for Plaintiff



1 IAFD  
 2 Orlando De Castroverde  
 3 Nevada Bar No. 7320  
 Alex De Castroverde  
 4 Nevada Bar No. 6950  
**DE CASTROVERDE LAW GROUP**  
 5 1149 South Maryland Parkway  
 Las Vegas, Nevada 89104  
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 fax 702.383.8741  
 6 Attorney for Plaintiffs

7 **DISTRICT COURT**  
 8 **CLARK COUNTY, NEVADA**

9 FELICITAS ZAMBRANO,

10 Plaintiff,

11 v.

12 CARDENAS MARKETS, INC. d/b/a  
 13 CARDENAS; DOES I-V and ROES  
 CORPORATIONS VI-X, inclusive.

14 Defendants.

CASE NO.:  
 DEPT NO.:

**INITIAL APPEARANCE FEE**  
**DISCLOSURE (NRS CHAPTER 19)**

15 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are  
 16 submitted for parties appearing in the above entitled action as indicated below:

17  
 18 FELICITAS ZAMBRANO \$270.00

19 **TOTAL REMITTED:** **\$270.00**

20  
 21 DATED this <sup>th</sup> 10 day of June, 2016

22 By:   
 23 Orlando De Castroverde  
 Nevada Bar No. 7320  
 24 David Menocal  
 Nevada Bar No. 13191  
 25 1149 South Maryland Parkway  
 Las Vegas, Nevada 89104  
 26 702.383.0606  
 27 Attorney for Plaintiffs  
 28